

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

<b>IN RE:</b>	)	
	)	
<b>TRAVIS RYAN YOUNG,</b>	)	
	)	
<b>Debtor.</b>	)	<b>Bankruptcy Case No. 17-30163-HCM-13</b>
_____	)	
	)	
<b>PAMELA YOUNG,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Adversary Case No. 17-03010</b>
	)	
<b>TRAVIS YOUNG,</b>	)	
	)	
<b>Defendant.</b>	)	

**MOTION FOR EXPEDITED SETTING ON TRAVIS YOUNG’S MOTION TO COMPEL  
TURNOVER OF PROPERTY OF THE ESTATE  
PURSUANT TO 11 U.S.C. SECTIONS 541(a) and 542(a) & (e)  
AGAINST FORMER COUNSEL**

TO THE HONORABLE H. CHRISTOPHER MOTT, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW Travis Ryan Young (the “Debtor” or “Mr. Young”), through his attorneys of record MIRANDA & MALDONADO, P.C., and files this *Motion for Expedited Setting of Motion To Compel Turnover of Property of the Estate Pursuant to 11 U.S.C. Sections 541(a) and 542(a) & (e)* (the “*Motion for Expedited Hearing*”). In support of the *Motion for Expedited Setting*, Mr. Young would show this Court as follows:

1. On January 26, 2017 Mr. Young filed his *Motion To Compel Turnover of Property of the Estate Pursuant to 11 U.S.C. Sections 541(a) and 542(a) & (e)* (the “*Motion to Compel Turnover*”) seeking an *Order* from this Court compelling his former attorney in the pending Chapter 7 case and two (2) adversary proceedings, Michael Nevarez, Esq. (“Mr. Nevarez”) to

release and turnover, or otherwise make available for reproduction, all documents and electronic files comprising his Client File.

2. Cause exists to expedite the hearing on the *Motion to Compel Turnover* in that the information sought is necessary to ensure compliance to the best of his abilities with discovery demands propounded by Plaintiff Pamela Young in the pending *Adversary Proceedings*. Without this information, the potential exists that Ms. Young will continue seeking sanctions against Mr. Young for her perceived failure to comply with her discovery requests.

3. It is Mr. Young's request that the *Motion to Compel Turnover* should set on this Court's next available live docket.

Respectfully submitted,

**MIRANDA & MALDONADO, P.C.**

/s/ Carlos A. Miranda, Esq.

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Attorneys for Debtor Travis Ryan Young

### **CERTIFICATE OF SERVICE**

I certify that on the 27<sup>th</sup> day of January 2018, a copy of the foregoing document was served as provided by the Electronic Case Filing System for the United States Bankruptcy Court for the Western District of Texas to the Parties listed in *Creditor Matrix* as well as to the following Parties-in-Interest:

/s/ Carlos A. Miranda, Esq.  
Carlos A. Miranda, Esq.  
Carlos G. Maldonado, Esq.  
Attorneys for Debtor Travis Ryan Young

#### **Chapter 7 Trustee**

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